

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PUREWICK CORPORATION)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 19-1508-MN
)	
SAGE PRODUCTS, LLC,)	
)	
Defendant.)	

MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Pursuant to D.I. 123, PureWick and Sage respectfully move this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters:

- PureWick's dispute regarding Judge Noreika's discovery orders (D.I. 24 at §7(d), D.I. 87-1 at ¶2, D.I. 89) on disclosure of invalidity contentions and narrowing of prior art references and combinations.
- Sage's dispute regarding Judge Noreika's discovery orders (D.I. 72 at 28, D.I. 84, D.I. 89 (referencing D.I. 87-1 at ¶1)) on PureWick's narrowing of asserted claims and PureWick's response to Sage Interrogatory No. 6 regarding PureWick's prior art products.
- Sage's dispute regarding PureWick's responses to Sage Interrogatory Nos. 5 and 15 relating to details about PureWick's prior art products.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on the following date: February 10, 2021.

Delaware Counsel:

- Plaintiff: John W. Shaw, Shaw Keller LLP
- Defendants: Anne Shea Gaza, Young Conaway Stargatt & Taylor, LLP

Lead Counsel:

- Plaintiff: Brian P. Biddinger and Nicola R. Felice, Quinn Emanuel Urguhart & Sullivan, LLP
- Defendants: Christopher M. Scharff, Bryce R. Persichetti, and Ryan J. Pianetto of McAndrews, Held & Malloy, Ltd.

The parties are available for a teleconference on the following dates: March 19, 22, & 24, 2021. For the briefing deadlines, the parties request 72 hours (3 business days) to respond to opening letter briefs.

/s/ John W. Shaw

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Dated: March 5, 2021